

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Danielle L. White a/k/a Danielle Robinson
Debtor(s)**

BK NO. 22-10870 MDC

**US Bank Trust National Association, Not In Its
Individual Capacity But Solely As Owner Trustee
For VRMTG Asset Trust**

Chapter 13

Movant

Hearing Date: 6/23/2022

vs.

**Danielle L. White a/k/a Danielle Robinson
Respondent(s)**

**OBJECTION OF US BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR VRMTG ASSET
TRUST
TO CONFIRMATION OF CHAPTER 13 PLAN**

US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On June 8, 2022, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$37,509.49.
2. Debtor's Plan provides for payment in the amount of \$18,000.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$19,509.49, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
- 6.

WHEREFORE, the Secured Creditor, US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: June 13, 2022

By: /s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorney for Movant/Applicant